

EXHIBIT 18

Michael Schulz
09/10/2024

Page 1

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,
Individually and as Parent
and Legal Guardian of W.W,
K.W., G.W., and L.W., minor
children, and MATTHEW
WADSWORTH

Plaintiffs,)

vs.)

WALMART, INC., and JETSON)
ELECTRIC BIKES, LLC,)

Defendants.)

No. 2:23-cv-00118-NDF

DEPOSITION OF MICHAEL J. SCHULZ

Tuesday, September 10, 2024

Roseville, California

REPORTED BY: Joy E. Shure, CSR No. 3659

Michael Schulz
09/10/2024

Page 145

1 to be the first one to fail and that the failure of that
2 one may have contributed to the failure of the next
3 cell.

4 Q. Okay. But who told you it was a lithium-ion
5 battery cell that failed? Was that counsel?

6 A. I could see that in the extract. I could see
7 that when I visually looked at the hoverboard.

8 Q. But you're not offering any opinions as to the
9 cause of this fire; correct?

10 A. Correct.

11 Q. So where do you get the information on the
12 first fuel ignited?

13 A. I'm reporting this from my understanding of
14 what Mr. King's opinions are going to be as related to
15 me by counsel.

16 Q. So you got this information from counsel?

17 A. That's the basis for it, yeah. I'm not
18 rendering that opinion independently and separately from
19 Mr. King.

20 Q. Because you haven't talked to King, you haven't
21 read King's report; correct?

22 A. Correct.

23 Q. So the opinion under "first fuel ignited,"
24 that's not your opinion?

25 A. That's correct. That's fair.